

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

FILED

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CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

CRIMINAL NO.

**A16 CR 101 SS**

v.

INDICTMENT

DARRELL RAY HOBBS

[Violation: 18 U.S.C. § 2261A -  
Stalking; and 18 U.S.C. §2262 Interstate  
Violation of Protection Order]

THE GRAND JURY CHARGES:

COUNT ONE  
[18 U.S.C. §2261A]

Beginning on or about 2012, and continuing until on or about June, 2015, within the Western District of Texas and elsewhere, the Defendant,

**DARRELL RAY HOBBS,**

with the intent to harass, intimidate, or place under surveillance with the intent to harass or intimidate "DH," engaged in a course of conduct that caused, or would be reasonably expected to cause, substantial emotional distress to "DH," and said Defendant used facilities of interstate commerce, including interactive computer service or electronic communication service, to engage in this course of conduct which included sending emails and text messages.

The course of conduct engaged in by Defendant included, but is not limited to, two or more of the following acts, among others:

1. In or about 2012, DARRELL RAY HOBBS, hereafter HOBBS, became angry and violent after he was confronted by "DH" regarding their daughter previously finding a hidden surveillance camera in the children's bathroom which was taping the daughter undressing prior to

taking a shower. HOBBS started throwing furniture around and threatened to destroy "DH's" life. He also turned his angry attention to "DH's" daughter whom HOBBS adopted when she was about three years of age. HOBBS called the daughter a "fucking bitch," said he disowned her, and informed "DH" that she must disown her daughter as well.

2. In or about 2013, HOBBS, became increasingly angry and obsessed over the change in "DH's" response to him following the revelation that HOBBS had surreptitiously placed a camera to tape the activities in the children's bathroom. HOBBS attributed the change in "DH's" attitude toward him, including "DH's" unwillingness to continue submitting to HOBBS's angry outbursts as she had in previous years, to a belief that "DH" must have found a new man as opposed to "DH" simply being unwilling to tolerate his behavior.

3. In or about August, 2013, HOBBS was fired from his job, and spent increasing amounts of time escalating his verbal attacks against "DH," who is a school teacher. HOBBS started calling "DH" a "bitch, whore, cunt, or slut" on a continual basis. HOBBS' verbal attacks expressed his increasing suspicion that "DH" must be having an affair and that this was the reason "DH" was no longer obedient to HOBBS' angry outbursts.

4. In or about September, 2013, HOBBS started focusing the majority of his time conducting surveillance of "DH's" movements and harassing "DH" with continual verbal insults.

5. In or about October, 2013, HOBBS informed "DH" that if she ever called the police on him for any reason that she would have to look over her shoulder for the rest of her life after HOBBS got out of jail.

6. In or about November, 2013, HOBBS elevated his surveillance, intimidation and harrassment of "DH" by hiding recording devices in her bedroom, car, purse and work bag, including installing spyware on "DH's" phone.

7. In or about December, 2013, HOBBS took "DH's" iPhone from her hand, smashed it with a hammer and then started throwing and breaking furniture and personal items. HOBBS took out a handgun and put it to his head and threatened to kill himself. HOBBS then pointed the gun at the floor and shot the gun off inside the house. HOBBS then left and came back without the gun and told "DH" that he was hiding the gun in case she called the police. HOBBS told "DH" that if she ever left him he would send emails to her friends and coworkers saying horrible things to try and hurt her reputation and would put harmful photos of her on the internet. HOBBS had placed hidden video cameras in "DH's" dressing closet and was taking surreptitious photos of her in the nude as she exited the shower and came to her closet to change clothes. HOBBS maintained these photos as a tool to humiliate "DH" if she did not comply with his future demands.

8. In or about January 2014, after a Tire and Lube shop employee found and removed the surveillance equipment on "DH's" car and an Apple employee found and removed spyware on "DH's" iPhone, HOBBS placed additional spyware on "DH's" phone. HOBBS continued to demonstrate his control over "DH" by changing her passcodes or passwords on her computer and email accounts so "DH" could not log onto her account. HOBBS further harassed "DH" by having her phone service disconnected several times.

9. In or about February 2014, HOBBS continued to display his preoccupation with "DH's" imagined infidelity and threatened that it would be her fault if someone was killed

because that is what he would do to anyone having an affair with her. HOBBS was served with divorce papers on or about February 15, 2014. HOBBS continued his surveillance of "DH," following her to stores, jumping in her car and confiscating her phone and demanding her passcode.

10. In or about March 2014, HOBBS threatened "DH" after she confronted HOBBS regarding a cell phone "DH" had found taped to her front car bumper. HOBBS threatened to break her car window if "DH" didn't keep it unlocked (so he could access her car) and said he would continue to make "DH's" life a living hell. HOBBS inserted additional trackers on "DH's" car, including hiding a voice recorder in her dash board. HOBBS would also employ additional tactics to torment and harass "DH" such as disabling her car or pouring waxy substances all over her car windows so she could not see to leave for work.

11. On or about March 23, 2014, HOBBS ranted to "DH" that he was going to kill the imaginary individual with whom "DH" was supposedly having an affair. HOBBS called "DH" a "sorry cunt liar" when she told him there was no one else.

12. On or about March 24, 2014, HOBBS caused humiliation and emotional distress to "DH" before her school's officials by sending threatening text messages to another former teacher whom HOBBS wrongly suspected must be having an affair with "DH." HOBBS ignored harassment charges filed against him by the teacher he had wrongly accused, as well as "DH's" pleas to stop spreading hateful and false statements. HOBBS continued with his harassment and threats. HOBBS informed "DH" that he would call her principal and tell him some more false allegations to try and discredit "DH."

13. On or about March 25, 2014, HOBBS was served with a Temporary Protection Order (TPO). HOBBS was provided notice in the TPO that HOBBS was prohibited from threatening, physically injuring or harassing "DH." The court further prohibited HOBBS from any contact with "DH," including in person, by telephone, through the mail, through email, or through another person and that he needed to stay at least 100 yards away from "DH's" residence. The protection order also provided notice to HOBBS that "If you travel across state or federal land lines with the intent to violate the temporary order for protection and subsequently violate such order, you may be convicted of committing a federal offense under the VAWA (Violence Against Women Act), 18 U.S.C. Section 2262(a)(1)."

14. On or about June, 2014, despite "DH's" move from Nevada to Austin to get away from HOBBS, HOBBS continued to call, send text messages, and email "DH" in violation of the Protection Order.

15. On or about August 6, 2014, a protection order was filed against HOBBS which extended the same provisions of the earlier protection order from August 6, 2014 to August 6, 2015.

16. On or about October 31, 2014 and early November, 2014, HOBBS followed "DH" to Austin despite the prohibition in the protection order to have no contact with "DH" and despite the fact that "DH's" divorce from HOBBS was finalized in October, 2014.

17. On or about October 31, 2014 and early November, 2014, HOBBS sent the following emails to "DH" indicating he was looking for a place to live in Texas:

a. **From:** Darrell [mailto:[hobzzz@cox.net](mailto:hobzzz@cox.net)]

**Sent:** Friday, October 31, 2014 12:57 PM

**Subject:** Will you have dinner with me so we can talk?

I am in town until tomorrow, will you meet me to have a couple of drinks and dinner so we can talk?  
Can I see Tobie.....please?

b. **Nov 2, 2014 from HOBBS to "DH"**

"I came to Texas to look for a place to live. I'm planning on being out of the house by the end of the month. I had to stay longer than I expected... my flight is at....."

18. On or about November 20, 2014, HOBBS sent a lengthy email to "DH" from email address [hobzzz@cox.net](mailto:hobzzz@cox.net). HOBBS indicated his full knowledge of the existence and extension of the Protection Order stating words to the effect of: "you did everything you could to make it tough for me to find a job...namely extending the TPO for a full year longer. (explain that one if you could) And you had it extended after you were already living 1400 miles away from me." The email also demonstrated HOBBS continued attempts to harass "DH" by holding hostage the financial assets which were her share in the divorce. HOBBS stated "If you want to have the house and car papers signed, the taxes done together (which saves you money), and a few other things that I won't offer yet, than you will need to offer me a place to stay the weekend after Thanksgiving and you will have to come clean and talk to me about EVERYTHING. You will have to sign a release to the TPO and give it to me. And finally, you will have to actually try to help us rebuild our relationship."

19. On or about November 21, and 24, 2014, HOBBS received the following emails from "DH" providing HOBBS notice that "DH" refused to be controlled by HOBBS and wanted

no further contact with HOBBS.

I have not changed. I have never been unfaithful. There has never has been anyone else in my life besides my children. Throughout our marriage, you were in control and I allowed it because of our family, but I can no longer allow you to control me.

**Date: Mon, Nov 24, 2014 at 9:24 PM**

Subject: What will it Take?

To: Darrell HOBBS <[hobzzz@cox.net](mailto:hobzzz@cox.net)>

Darrell,

I just want you to leave me alone and let me get on with my life. What will it take for you to leave me alone?

HOBBS ignored "DH's" pleas to be left alone by sending a barrage of emails.

20. On or about January 2, 2015, HOBBS stated words to the effect of: "...You've underestimated me during this whole ordeal, but believe me, if I wanted to screw the rest of your life up (from a mental perspective)....I could."

21. On or about February 11, 2015, HOBBS stated words to the effect of: "This time I was ready and even though I'll pay the ultimate price in the end.....you'll be exposed for what you are....trust me."

22. On or about February 15, 2015, HOBBS emailed "DH" with the Subject line stating "We will talk as long as I want to ....." HOBBS requested "DH" to give her boyfriend "my" (HOBBS') number and stated, "the attached picture is just one of many that will eventually embarrass you...trust me..." HOBBS attached nude photographs of "DH" which had been taken with a hidden camera in "DH's" closet without her knowledge or consent.

23. On or about February 15, 2015, HOBBS received additional notice from "DH" that his emails were unwelcome. HOBBS received the following email from "DH":

Darrell,

You have made it very clear that you only have hatred in your heart for me.....and for that I am sorry.

I loved you and wish only the best for you. I will not be receiving any of your emails and I will not respond to any correspondence you give the boys.

24. On or about February 15, 2015: HOBBS responded by stating "That's unfortunate....for you."

25. On or about February 16, 2015, HOBBS sent an email to "DH" with only a Subject line stating "You're right...I do hate you!" with no other message attached.

26. On or about March 27, 2015, after receiving no response from "DH," HOBBS used a different email address, [hobzzzz@yahoo.com](mailto:hobzzzz@yahoo.com), to send an email to "DH" indicating he had sent her 3 text messages but was following up with email in case she was blocking his text messages. HOBBS received additional notice from "DH" that his emails were unwelcome, as follows:

Darrell,

I have blocked you from my phone, so I do not receive text or phone messages from you.

You feel I have changed and that I am not the person you married 25 years ago. I feel you are not the man I fell in love with 25 years ago. Lets just remember the good times in our marriage and move forward with our lives.

You need to move on with your life and find happiness. I will never meet with you because I do not trust you. I am sorry.

Please stop emailing me. I will not respond to anymore emails you send to me.



27. In April, 2015, HOBBS utilized email address [hobzzzz@yahoo.com](mailto:hobzzzz@yahoo.com) to send threatening emails to "DH."

28. On or about April 12, 2015, HOBBS sent an email to "DH" stating words to the effect of, "...You won't find out how bad you screwed up until much later..."but remember that all I asked was for you to be my friend."

29. On or about April 15, 2015, HOBBS sent an email to "DH" stating words to the effect of, "Please don't make me travel to Georgia and force the information out of him....because you know I will."

30. On or about April 15, 2015, HOBBS sent an email to "DH" stating words to the effect of, "Okay...I gave you a chance to say something....the last time you'll get one. bad decision on your part..."

31. On or about April 17, 2015, HOBBS sent an email to "DH" stating words to the effect of, "You can continue to try and have me arrested. All i can say is.....good luck with that."

32. On or about April 18, 2015, HOBBS sent an email to "DH" stating words to the effect of, "...how you cheated on me. Your sons will be so proud of you....you're nothing but a scumbag....actually cumbag would be more accurate."

33. On or about April 18, 2015, HOBBS sent an email to "DH" stating words to the effect of, "I'm seriously considering emailing every person at Trinity School the facts about how you like to cheat with coworkers. With nude pics of you included..."

34. On or about April 18, 2015, HOBBS sent an email to "DH" stating words to the effect of, "Keep ignoring me and I'll do it this weekend!"

35. On or about April 18, 2015, HOBBS sent an email to "DH" stating words to the effect of, "Okay...I'm sure you'll regret this decision in the future...but it's your mistake to make. Work will be interesting for you in the near future....Also, I have plans for your family & friends who made the mistake of getting involved in my business. It will be interesting once they realize you threw them under the bus to save your BS false reputation. I think you'll be impressed with the information I gathered over the last 18 months. In the future there will be no forewarning...you'll find out things as they occur. Just remember...I gave you every opportunity to be honest and end this BS."

36. On or about April 18, 2015, HOBBS sent an email to "DH" stating words to the effect of: "...call me....let's talk. Otherwise I'll take the next step and your life will never be the same.... Mine either....but I don't have as much to lose."

37. On or about April 19, 2015, HOBBS, in another email to "DH," stated "BTW, I will eventually get Tobi....bank on it."

38. On or about April 19, 2015, HOBBS sent an email to "DH" stating words to the effect of "I actually don't feel good about the pain you're feeling now, and the horrific pain pain you'll experience this next week (you'll understand better in a few days), but at least I'm being honest about the things I'm doing to you. You'll never understand the pain I've been experiencing for over a year.... Hope your happy now."

39. On or about April 19, 2015, HOBBS again emailed "DH," and stated words to the effect of "Talk to me after you lose your job and can't get another one (will happen soon)....which is exactly what you did to me. The difference is that I didn't deserve to be put in the situation I find myself in.....you do. Trust me...it's only going to get worse for you AND

your family AND friends. I've been planning this for a very long time, but hoped it wouldn't be necessary." HOBBS concluded the email by stating "I'll give you until Friday until I begin taking things out on the people you care about, but that's it. I've allowed you to think you're in control for a long time.....not anymore. When will you quit underestimating me ("DH")?"

40. On or about April 19, 2015, HOBBS sent an email to "DH's" school stating "The school should know that ["DH's" first and last name] had several incidents of having extra marital affairs with coworkers, as well as a student's parent at her previous employer – Dawson School in Las Vegas. She also provided compensated tutoring lessons to students that she taught...strictly against Dawson School policy. She has also accepted employment with Founders Academy for the upcoming 2015-16 school year. ["DH"] will lie about these things if asked...it's her MO. she's not what she appears to be. If ["DH"] remains employed at Trinity this information will be furnished to the public." HOBBS had created an alternate email address to send this email from, frankjohnson804@yahoo.com, in order to prevent the school from blocking email addresses connected to his true name.

41. On or about April 19, 2015, HOBBS posted a review for "DH" on ratemyteachers.com with the intent to harass "DH" and injure the reputation of "DH." HOBBS posted a review above a previous rating which labeled "DH" as "the most caring and best teacher I have EVER had." In his published review, HOBBS stated "Mrs. Hobbs is easy. After me, she had at least 2 more affairs with married coworkers at Dawson School in Las Vegas Nevada. She was married at the time. . . . so nothing is off limits when it comes to hooking up."

42. On or about May 13, 2015, HOBBS, knowing the immeasurable value that "DH" placed on her children, wrote a letter to the sons of "DH" and HOBBS. In his letter HOBBS

informed their sons that if they continued to maintain a relationship with their mother "I WILL NO LONGER HAVE A RELATIONSHIP WITH EITHER OF YOU, EVER AGAIN." HOBBS further informed his sons "IF YOUR MOTHER THINKS THIS WILL BE THE END OF IT....SHE'S DEAD WRONG! EACH MINUTE I SIT IN THIS JAIL I GET MORE PISSED...BOTH AT HER AND AT BOTH OF YOU FOR NOT HELPING ME OUT." HOBBS concluded the letter to his sons with the sentence that his dog "NOW MEANS MORE TO ME THAN EITHER OF YOU DO..."

43. On or about June, 2015, HOBBS sent a letter to one of his sons requesting help in clearing items out of his rental home. On the side of the letter HOBBS wrote "I WANT ALL KNIVES, MACE, HANDCUFFS, KEYS, ETC!"

All in violation of Title 18, United States Code, Section 2261A.

**COUNT TWO**  
**[18 U.S.C. §2261A]**

On or about December, 2014, within the Western District of Texas and elsewhere, the Defendant,

**DARRELL RAY HOBBS,**

did knowingly and intentionally travel across a State line, namely the Texas State line, having previously been located in the State of Nevada, and did travel across said State line with the intent to harass, intimidate, or place under surveillance with intent to harass, or intimidate another person, to wit: "DH," and as a result of such interstate travel the Defendant caused substantial emotional distress to "DH," in violation of Title 18, United States Code, Section 2261A.

**COUNT THREE**  
**[18 U.S.C. §2262]**

On or about October 30, 2014, within the Western District of Texas and elsewhere, the Defendant,

**DARRELL RAY HOBBS,**

did knowingly and intentionally, travel in interstate commerce, with the intent to engage in conduct that violates a portion of a protection order issued against Defendant that prohibited or provided protection against contact or communication with, harassment against, or physical proximity to "DH," and Defendant's travel was in violation of, and occurred subsequent to, the issuance of the protection order in Clark County, Nevada which covered the time period from on or about August 6, 2014 to on or about August 6, 2015, all in violation of Title 18, United States Code, Section 2262.

**COUNT FOUR**  
**[18 U.S.C. §2262]**

On or about November 30, 2014, within the Western District of Texas and elsewhere, the  
Defendant,

**DARRELL RAY HOBBS,**


did knowingly and intentionally, travel in interstate commerce, with the intent to engage in  
conduct that violates a portion of a protection order issued against Defendant that prohibited or  
provided protection against contact or communication with, harassment against, or physical  
proximity to "DH," and Defendant's travel was in violation of, and occurred subsequent to, the  
issuance of the protection order in Clark County, Nevada, which covered the time period from on  
or about August 6, 2014 to on or about August 6, 2015, all in violation of Title 18, United States  
Code, Section 2262.

A TRUE BILL:

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

RICHARD L. DURBIN, JR  
UNITED STATES ATTORNEY

By:

  
ELIZABETH COTTINGHAM  
Assistant U. S. Attorney